

Exhibit A

From: John Garza <jgarza@garzanet.com>

Date: February 7, 2019 at 8:41:23 AM EST

To: "Bracey, Kali N." <KBracey@jenner.com>, "Daniel Cox" (dcox@coxlawcenter.com)" <dcox@coxlawcenter.com>

Subject: RE: Barjo v. Cherian

External Email – Exercise Caution

Kali:

I have a few rooms or conf. room you can use. If you prefer we can do your client at your office and my clients, Frank and Rahul at my office. My clients do intend to be at the depo as they have a right and I need them to assist me.



John R. Garza
Garza Law Firm, P. A.
Garza Building
17 W. Jefferson Street
Suite 100
Rockville, Md 20850
301 340 8200, Extension 100
jgarza@garzanet.com
www.garzanet.com

Top Washington Lawyer – *Washingtonian Magazine*
Maryland Super Lawyer – *Super Lawyer Magazine*
Highest Rating – Martindale Hubbel
Million Dollar Advocates Forum
Top 100 Maryland Lawyers – National Association of Trial Lawyers

The preceding email message may be confidential or protected by the attorney-client privilege. It is not intended for transmission to, or receipt by, any unauthorized persons. If you have received this message in error, please (i) do not read it, (ii) reply to the sender that you received the message in error, and (iii) erase or destroy the message. Legal advice contained in the preceding message is solely for the benefit of the Garza Law Firm, P.A. client(s) represented by the Firm in the particular matter that is the subject of this message, and may not be relied upon by any other party. NOTICE: I may use this email account for personal or non law firm related transmissions, the mere fact that the email is from the firm account does not create an attorney client relationship and the context of the message controls. I may use this account for business or non business matters completely unrelated to the law firm. Furthermore, if you read this, you have too much time on your hands.

From: Bracey, Kali N. <KBracey@jenner.com>

Sent: Wednesday, February 06, 2019 5:52 PM

To: John Garza <jgarza@garzanet.com>

Cc: 'Daniel Cox' <dcox@coxlawcenter.com>; Birnbaum, Samuel C. <SBirnbaum@jenner.com>; Lam, Natacha Y. <NLam@jenner.com>

Subject: Barjo v. Cherian

John,

We are in receipt of your notice and will plan for the deposition on February 21. There are two related matters we would like to confirm:

First, we ask that you please provide us with a break-out room at your offices that we can use during breaks.

Second, given the nature of this case, having the Cherians in the deposition room would be traumatic and distressing for Ms. Barjo. Accordingly, we would like to make sure that members of the Cherian family will not attend the deposition in person. We are open to your clients dialing in via phone, attending via video link, or waiting in another room and conferring with you at breaks, if they would like to do so. We believe we would be entitled to a protective order in this vein under FRCP Rule 26(c), but would prefer to avoid litigating the issue. If you and your clients agree to not to be in the room, we will not construe it as any sort of admission of guilt. Please let us know by Friday, February 8, if you agree to this condition.

Regards,
Kali